

EH&S Policies & Manual Group Highlights

October 2004

► Policies & Manual Group Initiatives

- ✓ The new PMG module is pending testing by Christina and me. We are meeting with MIS in early November to review some initial observations.
- ✓ Noted some QA items for correction while researching in the EH&S Manual that Christina corrected.
- ✓ Noted some issues of continuity in Table 1 of Appendix 2200-R1. We will set up a meeting with the author in early November to address possible revisions.
- ✓ Chapter 6620, *Personal Protective Equipment* and Chapter 6170, *Motor Vehicles* underwent revision to integrate JLab's new bicycle helmet policy.
- ✓ Received an email from an individual at Tetra Tech who was perusing our EH&S Manual online. He informed us that Revision 5.6 of the Jefferson Lab EH&S Manual Appendix 6732-T3 does not include the current language of the SPCC regulations found at 40 CFR 112 (as amended August 17, 2004). Christina will post this observation in the tracking system and send it to the author for resolution.

► EH&S Manual Updates

- ✓ Received request from Bert Manzlak to change the safety warden assignment in the Test Lab Addition's former machine shop area. Per our agreement with Phil Mutton, Christina requested Phil's approval first before implementing Bert's requested change. Phil approved the request and added a few additional changes within SRFINF. All changes were posted to Table 3 in Appendix 2200-R1.
- ✓ Chapter 3310, *Standard Operating Procedures and Operational Procedures* – the author completed review of Level 3 comments. Received new request from L. Even, in support of the lab's Environmental Management Systems (EMS) implementation, to add a requirement for work control document authors to include environmental considerations in their SOPs and OSPs. This request is specific to an EMS objective with a target of December 1, 2004. Linda will provide the wording changes. At month's end, the changes were pending. will be Once EMS changes are received and integrated, the chapter will be distributed for a Level 3B review due to significant changes made as a result of the previous review comments received.
- ✓ Chapter 3330, *Stop Work* –changes that arose from lessons learned in the JLG manlift stop work are pending input from Rusty Sprouse.
- ✓ Chapter 6220, *AC Electrical Power Distribution Safety* – Awaiting the summary of changes that accompanies chapters in the DC review. New ESS chair, John Musson, is working with John Kelly on preparing the summary which is overdue.

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- ✓ Chapter 6240, *Electrical Equipment Construction* – We are still awaiting new author's feedback.
- ✓ Chapter 6630, *Respiratory Protection* – Received author's feedback. Level 3 review should be sent out by the end of November.
- ✓ Chapter 3210, *Hazard Identification and Characterization* – Awaiting reconciliation of comments from Level 2 review from author (Bob May).
- ✓ Chapter 6750 *Environmentally Harmful Materials* – Completed changes from Linda. Christina is working on a comparison document to reflect the changes made to the chapter as well as the information extracted from the original chapter and put into an EP Supplement.
- **Director's Council Packages [Level 4 Review]**
 - ✓ Director's Council package containing Chapters 5200 *Incident Investigation* and 6420 *RF and Microwave Radiation* and the Peer Review changes to the *RadCon Supplement* was delayed due to postponement by Director's Council. Package was delivered on October 27th. Approvals and comments are due back by Wednesday, November 10, 2004.
 - ✓ Chapters 2410 *Applicable Regulations and Contractual Commitments* and 6850 *Regulated Medical Waste Management* – received approval signatures.
 - ✓ Technical Appendix 6210-T2, *Extension Cord Safety* – Received approval signatures. Roy Whitney has a significant change that he passed on to John Kelly. Christina has left messages with John Kelly regarding this change. We are awaiting John's feedback.
- **EH&S Manual Revision Status – Color Coded Table**
 - ✓ The color coded table of EH&S Manual chapters and appendices (dated October 6, 2004) can be viewed at:
http://docushare.jlab.org/Get/File-8112/Color_coded_table-4-29-04.xls.
Next update will be in January 2005.
- **Items in Backlog**
 - ✓ Still working on effort to reduce the current backlog of environmental chapter updates and the associated EP Supplement.
 - ✓ Christina is updating the cross-reference links in the html version of the Manual. This is detaining the uploading of newly revised /approved chapters as the upload process requires all links to be done at once. Copies of the newly approved chapters are available in the pdf version of the EH&S Manual. An EHSLOG notifying staff about the delay has been posted.



EH&S Reporting Activities for October 2004

➤ Key Activities

- As of October 31st, Jefferson Lab had achieved **90** consecutive days without a lost-time injury. The Lab record is **455** consecutive days without a lost-time injury. There have been **74** days without a DOE reportable injury.
- Carter Ficklen represented Jefferson Lab at the October 12-14 National Laboratory ES&H Management Workshop hosted by Fermi National Accelerator Laboratory. Topics included summer student safety, operational readiness reviews, injury reporting, electrical safety, and a roundtable discussion on ways to change the safety culture. Carter Ficklen gave an October 13th OSHA injury reporting presentation.
- The Environmental Management System (EMS) Implementation Team and backups focused on identifying the program to achieve the EMS objectives and targets identified in September.
- Discussions on EMS awareness training were begun.

➤ Other Activities

Occurrence Reporting

- EH&S Reporting provided the 4th quarter FY 2004 DOE occurrence reporting (ORPS) analysis to the DOE in October. This quarterly event review covered a range of Lab events including recordable injuries, first aid cases, operational summaries, and several assessment reports.
- An October 27th minor battery acid spill near the Hall C truck ramp was evaluated for external environmental agency and DOE ORPS reporting. The small release (about 1.5 quarts) was well below any level requiring external reporting. The event was promptly responded to by Accelerator Division industrial hygiene staff. The Physics Division will generate a Notable Event Report in November.
- EH&S Reporting provided EH&S performance measure results and supporting information for the FY 2004 Performance Measures Report for the DOE/SURA performance-based contract. The FY 2004 EH&S score was 89.3%. The FY 2004 EH&S performance of 89.3% is the lowest since JLab started performance measure tracking in FY 1996. The primary cause for this poor showing was the Lab safety performance (as measured by injury avoidance) with a Total Recordable Case rate of 2.0 (Lab FY 2004 target range was 1.0-1.3). Additional EH&S performance measure information is contained on the attached sheet.

- The one open corrective action, from the May 2004 Vertical Test Area interlock modification discovery, was completed on October 28th. This event had been reported in May under the DOE worker radiation protection rulemaking, 10 CFR 835, of the Price-Anderson Amendments Act. DOE verification of the event's corrective actions is planned for November.
- JLab observance of National Fire Prevention Week (October 3-9) was coordinated by EH&S Reporting. An all-staff announcement was provided with an "Electrical Fire Safety" brochure.

➤ **Work Smart Standards (WSS) Set**

- EH&S Reporting continued working with the Policy and Manuals staff to incorporate a review of WSS Set items along with EH&S Manual updates.
- Proposed changes to EH&S Manual Chapter 2420 are being processed.

➤ **National Environmental Policy Act (NEPA)**

- The start of preparation of the CEBAF and FEL Upgrade Environmental Assessment (EA) is awaiting notice from DOE.
- EH&S Reporting is working with other Lab staff to address other NEPA items, including actions related to the new retention pond planned to be constructed later this year.

➤ **Storm Water Permit Items**

- Construction Activity under Permit VAR 103277
 - The Permit and Working Draft of the Storm Water Pollution Prevention Plan (SWP3) are accessible on the jlab.org/ehs web page.
- Best Management Practices under Permit VAR 040079
 - EH&S Manual Chapter 6733 is being revised to document a site Storm Water Management Program, which will address permit and regulatory requirements.
 - Advance notice about reporting progress on our Best Management Practices and measurable goals was provided to involved staff.

DOE/SURA Contract Performance Objective # 3
"Quality Performance in Environment, Health, and Safety"
FY 2004 Results

October 2004

Performance Measure	Description	Maximum Points Available	Jefferson Lab Grade	Points Scored	Actual FY 2004 Information	Remarks
3.1	TRC (Total Recordable Case) Rate	50	76.7%	38.4	Jefferson Lab TRC rate - 2.0.	Jefferson Lab results compared to Lab TRC target (1.0 - 1.3 in FY04).
3.2	DART (Days Away, Restricted or Transferred) Rate	50	92.5%	46.3	Jefferson Lab DART rate - 0.7.	Jefferson Lab results compared to Lab DART target (0.4 - 0.8 in FY04).
3.3	Environmental Exceedances	20	100%	20	No Notices of Violation were received from environmental regulatory agencies.	Jefferson Lab results compared to DOE complex results.
3.4	Reportable Radiation Exposures	4	100%	4	No reportable exposures and satisfactory ALARA program evaluation.	Radiation exposure reporting criteria are extracted from DOE Occurrence Reporting thresholds.
3.5	Hazardous Substance Exposures	4	100%	4	No reportable exposures.	OSHA chemical exposure levels are utilized.
3.6	Fraction of Solid Waste Recycled	6	100%	6	FY 2004 solid waste recycling amount is 36.6 tons.	Goal of exceeding the FY 1994 baseline recycling ratio was raised in FY 1999 from 15% to 44%. Record information is provided by Facilities Management.
3.7	Fraction of Radioactive Waste Produced for Useful Purposes	4	100%	4	One radioactive waste shipment was made in March 2004. FY 2004 radioactive waste disposal was 7,000 pounds.	Information is collected by the Operability and Radiation Control Groups.
3.8	Ratio of Hazardous Waste Generated to That Which Would Have Been Produced With No Countermeasures	4	100%	4	FY 2004 hazardous waste generation total is 6,657 pounds.	Information is collected by the Hazardous Waste Coordinator.
3.9	Radiation Control Peer Review	4	90%	3.6	Peer review score was 90. This 2004 score is an improvement over the 2002 score of 88.	Peer review was held on August 30 - September 1, 2004. Emergency Management peer review is conducted in alternate years.
3.10	Fraction of high-value facilities rated "Highly Protected Risk."	4	86%	3.4	July 2002 evaluation of Lab's high value facilities resulted in a score of 93 (86% of available points). The review was conducted by SURA's fire and property insurance carrier. The next scheduled review was conducted in August 2004 and the score remained at 93.	Actions are currently underway on recommendations to improve the "Highly Protected Risk" scoring. High-value facilities are determined by the Facilities Management Director, with DOE Site Office concurrence. During FY 2001, this objective was revised to have reviews conducted every two years rather than annually. Remediation activities in Hall A, the only facility not meeting the designation in FY 2004, have not been completed.
	Totals -	150	89.3%	133.9		